

KIRKLAND & ELLIS LLP
AND AFFILIATED PARTNERSHIPS

Jeffrey J. Zeiger, P.C.
To Call Writer Directly:
(312) 862-3237
jzeiger@kirkland.com

300 North LaSalle
Chicago, Illinois 60654
(312) 862-2000
www.kirkland.com

Facsimile:
(312) 862-2200

July 2, 2015

Via E-mail

Judge A. Benjamin Goldgar
Everett McKinley Dirksen United States Courthouse
219 South Dearborn Street
Chambers 638
Chicago, Illinois 60604

Re: *In re Caesars Entertainment Operating Co, Inc.*, Case No. 15-03193
(ABG)

Dear Judge Goldgar:

In accordance with the Court's request during the June 22, 2015 omnibus hearing, counsel for CEOC and counsel for the Petitioning Creditors have agreed on the following schedule, subject to the Court's approval:

Fact and Expert Discovery:

August 27:	Fact discovery cut-off
August 28:	Exchange initial expert reports
September 11:	Exchange rebuttal expert reports
September 21:	Expert discovery cut-off

Witness Lists:

August 10: File and exchange initial witness list (identifying witnesses that a party believes (a) *will* be called to testify; (b) *may* be called to testify; and (c) will or may present testimony by deposition or other prior testimony; in the event a party learns after August 10, 2015 that a person not included on the initial list has knowledge of relevant facts and is a person that the party intends to call as a witness at trial, such party may promptly amend the initial list to include such person.)

KIRKLAND & ELLIS LLP

Judge A. Benjamin Goldgar
July 2, 2015
Page 2

September 28: File and exchange final witness list (identifying all witnesses, including experts, that a party intends to call at trial, and that had previously been identified on the initial witness list or an amended initial witness list)

Exhibit Lists:

September 21: Exchange exhibits and demonstratives and file lists of exhibits and demonstratives

September 28: File objections to exhibits

Transcribed Depositions:

September 10: File and serve deposition designations

September 17: File and serve deposition counter-designations and objections to initial designations

September 23: File and serve objections to deposition counter-designations

September 28: Submit complete copies of deposition designations and counter-designations

Video Depositions:

September 10: File and serve video deposition designations

September 17: File and serve video deposition counter-designations and objections to initial video deposition counter-designations

September 23: File and serve objections to video deposition counter-designations

September 28: Submit complete copies of deposition designations and counter-designations

Trial Briefs and Joint List of Stipulated Facts

September 28: File and serve trial briefs

September 28: File joint list of stipulated facts

In addition, the parties respectfully request that the Court increase the page limit to 25 pages for the trial brief.

KIRKLAND & ELLIS LLP

Judge A. Benjamin Goldgar
July 2, 2015
Page 3

Sincerely,

/s/ Jeffrey J. Zeiger, P.C.

Jeffrey J. Zeiger, P.C.
Counsel for CEOC

/s/ Sidney P. Levinson

Sidney P. Levinson
Counsel for Petitioning Creditors